

Exhibit C

RFPs to TPPs

Wholesaler Defendants hereby seek, pursuant to Rule 34, the following documents from class representative MADA and MSP, and from each Assignor of TPP claims to MSP, Summacare, Connecticare, and Emblem Health.

1. Transactional data of each claim for which you seek any damages and/or equitable or legal relief from Wholesaler Defendants in this MDL litigation (collectively, the "Claims," individually, a "Claim") on a Claim-by-Claim basis, that includes the following information:
 - a. the date of the Claim;
 - b. a Claim identifier;
 - c. the carrier ID;
 - d. the group ID;
 - e. the plan code;
 - f. the member/patient identifier;
 - g. the member/patient state;
 - h. the date of the purchase of the VCD made the subject of the Claim;
 - i. the corresponding NDC of the VCD made the subject of the Claim;
 - j. the batch or lot number of the VCD made the subject of the Claim;
 - k. the pharmacy name that dispensed the VCD made the subject of the Claim;
 - l. the city and state of the pharmacy that dispensed the VCD made the subject of the Claim;
 - m. the quantity dispensed of that NDC dispensed/purchased in that Claim;
 - n. the ingredient cost with regard to the subject VCD made the subject of the Claim;
 - o. the dispensing fee with regard to the subject VCD made the subject of the Claim;
 - p. the amount paid by the member/patient with regard to the subject VCD made the subject of the Claim;
 - q. the amount billed to you by any Wholesaler Defendant with regard to the subject VCD made the subject of the Claim;
 - r. the amount billed to you by any other entity with regard to the subject VCD made the subject of the Claim;
 - s. the amount paid by you to any Wholesaler Defendant with regard to the VCD made the subject of the Claim;

- t. the amount paid by you to any other entity with regard to the subject VCD made the subject of the Claim;
 - u. the adjusted amount paid by you to any Wholesaler Defendant with regard to the subject VCD made the subject of the Claim, including discounts, rebates, prescribing fees, PBM fees or other costs, allowances, or reimbursements;
 - v. the adjusted amount paid by you to any other entity with regard to the subject VCD made the subject of the Claim, including discounts, rebates, prescribing fees, PBM fees or other costs, allowances, or reimbursements;
 - w. The Wholesaler Defendant(s) you allege sold the specific VCDs made the subject of that Claim;
 - x. Any other entity you allege sold the specific VCDs made the subject of that Claim;
 - y. A notation where the Claim involved a direct purchase of a VCD by you from a Wholesaler Defendant, and the identity of such Wholesaler Defendant;
 - z. A notation where the Claim involved a direct purchase of a VCD by a Pharmacy Retailer from the VCD Manufacturer, with no involvement of a Wholesaler Defendant, and the identity of the Pharmacy Retailer and VCD Manufacturer.
 - aa. A notation where the Claim involved a direct purchase of a VCD by a Pharmacy Retailer from a non-defendant wholesaler or distributor, with no involvement of a Wholesaler Defendant, and the identity of the Pharmacy Retailer and non-defendant wholesaler or distributor.
2. Any and all documents which refer to, relate to and/or reflect No. 1(q) above.
 3. Any and all documents which refer to, relate to and/or reflect No. 1(s) above.
 4. Any and all documents which refer to, relate to and/or reflect No. 1(u) above.
 5. Any and all documents which refer to, relate to and/or reflect No. 1(w) above.
 6. Any and all documents which refer to, relate to and/or reflect No. 1(y) above.
 7. Any and all supporting contemporaneous records from each Assignors that support each Claim.
 8. Any and all documents which refer to, relate to and/or reflect any contracts and/or agreements between you and any Wholesaler Defendant.
 9. Any and all documents which refer to, relate to and/or reflect any payments made by you and/or on your behalf to any Wholesaler Defendant related to any purchases of, rebates for, other payments related to the provision of VCDs to your insureds or members.
 10. Any and all documents which refer to, relate to and/or reflect communications between you and any Wholesaler Defendant regarding any Claim, individually, or the Claims, collectively.

11. Any and all documents which refer to, relate to and/or reflect any and all communications between you and any Wholesaler Defendant regarding the VCDs made the subject of the Claims.
12. Any and all documents which refer to, relate to and/or reflect any and all communications between you and any entities other than the Wholesaler Defendants (1) regarding any Claim, individual, or the Claims, collectively, or (2) regarding the VCDs made the subject of the Claims.
13. Any and all documents which refer to, relate to and/or reflect the specific benefit you allege each Wholesaler Defendant(s) received with regard to each Claim, and the party who conferred such benefit on the relevant Wholesaler Defendant.
14. Any and all documents which refer to, relate to and/or reflect the portion of each specific benefit in No. 13 above that you allege it would be unjust for the relevant Wholesaler Defendant(s) to retain, and/or to the reason such retention would be unjust.
15. Any and all documents which refer to, relate to and/or reflect any action by a Wholesaler Defendant that misled you with regard to a Claim, and/or with regard to a VCD made the subject of a Claim.
16. Any and all documents which refer to, relate to and/or reflect each Claim for which you expected remuneration from a Wholesaler Defendant(s), the time at which you first expected such remuneration, the type and amount of such expected remuneration, and any failure of such remuneration.
17. Any and all documents which refer to, relate to and/or reflect each Claim for which you conferred a benefit on a Wholesaler Defendant(s) and the type and amount of such benefit you conferred.
18. Any and all documents which refer to, relate to and/or reflect each Claim for which you allege a Wholesaler Defendant engaged in any wrongdoing and/or unjust or improper conduct with regard to the VCDs made the subject of the Claims.
19. Any and all documents which refer to, relate to and/or reflect each Claim for which you had a direct relationship with a Defendant Wholesaler.
20. Any and all documents which refer to, relate to and/or reflect each Claim for which you incurred a direct expense that you would not have incurred regardless of the blood pressure prescription covered by you for your insured and/or member.
21. Any and all documents which refer to, relate to and/or reflect any action of a Defendant Wholesaler that directly or indirectly caused damage to you with regard to any specific Claim.
22. For each Claim, any and all documents which refer to, relate to and/or reflect the value provided to your insured and/or member by the covered VCD prescription and the amount of the value provided.

23. For each Claim, any and all documents which refer to, relate to and/or reflect the value provided to you by the covered VCD prescription and the amount of value provided.
24. For each Claim, any and all documents which refer to, relate to and/or reflect that a particular covered VCD prescription did not provide full value to your insured and/or member taking the specific VCD prescription, and the amount of value not provided.
25. For each Claim, any and all documents which refer to, relate to and/or reflect that a particular covered VCD prescription did not provide full value to you through fulfillment of your contractual obligations to your insureds and/or members and the amount of value not provided.
26. Any and all documents referring or relating to the safety of VCDs, the efficacy of VCDs, or discussions or determinations whether and how VCDs should be included on the formulary.
27. The underlying medical records for each patient who is a subject of the Claims.
28. Documents sufficient to determine the gross revenue, expenses and net profits to you on each Claim and the documents upon which you base your calculations of same.
29. Documents sufficient to determine your assessment of the value received by you from the VCDs made the subject of the Claims
30. Documents sufficient to determine your assessment of the value received by your insureds and/or members from the VCDs made the subject of the Claims.
31. Any and all documents which refer to, relate to and/or reflect the type of damages you seek with regard to each Claim.
32. Any and all documents which refer to, relate to and/or reflect the amount of damages you seek with regard to each Claim.
33. Any and all documents which refer to, relate to and/or reflect the Wholesaler Defendant from whom you seek the damages referenced in No. 31 and 32 for each Claim.
34. Any and all documents which refer to, relate to and/or reflect the methodology used to calculate the amount of damages referenced in No. 32 you seek with regard to each Claim.
35. For each Claim that you obtained through an assignment, any and all communications between you and the party making the assignment reflecting the negotiation of the assignment.